

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

ROBERT A. WILLIAMS,)	
)	
Plaintiff,)	Case No. 4:21-CV-966
)	
v.)	
)	
LG CHEM, LTD. and LG CHEM AMERICA, INC.,)	
)	
Defendants.)	

**DECLARATION OF HYUNSOO KIM
IN SUPPORT OF DEFENDANT LG CHEM AMERICA, INC.’S
MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

I, HyunSoo Kim, hereby declare and state as follows:

1. I am over the age of eighteen (18) and am competent to testify to the matters contained in this Declaration.

2. I am the Compliance Manager and authorized representative for Defendant LG Chem America, Inc. (“LGCAI”). I have personal knowledge of the facts described in this Declaration. If called upon as a witness, I could and would testify competently under oath as to all such facts based upon my personal knowledge and my review and knowledge of the business records of LGCAI.

3. This Declaration is submitted in support of LGCAI’s Motion to Dismiss for Lack of Personal Jurisdiction, and I have been authorized by LGCAI to execute this Declaration for this purpose.

4. LGCAI is a Delaware incorporated entity with its principal place of business in the State of Georgia. It was incorporated in the State of Delaware on March 1, 2009.

5. LGCAI’s corporate headquarters is located at 3475 Piedmont Rd. NE, Suite 1200, in Atlanta, Georgia. The President and Chief Financial Officer of LGCAI live near and work in Atlanta, Georgia.

6. LGCAI does not have an office in the State of Missouri.

7. LGCAI is not registered to do business of any kind in Missouri and does not have a registered agent for the service of process in the State of Missouri.

8. LGCAI does not own, lease, or rent any real property in the State of Missouri.

9. LGCAI has no employees who work in the State of Missouri.

10. Plaintiff Robert A. Williams alleges in his Complaint that he was injured on or about August 7, 2018, when two lithium ion batteries he purchased for use with his electronic cigarette device allegedly exploded in his pants pocket. (Compl., ¶¶ 1, 42–43.) Plaintiff identifies the subject batteries as “LG-manufactured 18650 lithium-ion batteries.” (Compl., ¶ 42.) Plaintiff alleges he purchased the subject e-cigarette device and the subject batteries from “a retail store in Missouri.” (*Id.*)

11. LGCAI primarily sells and distributes various petrochemical materials and products including ABS resin, Engineered Plastic (EP), Rubbers, Acrylate, Super Absorbent Polymer (SAP), and Specialty Polymers. LGCAI does not have any manufacturing plants and does not manufacture any products.

12. If the subject batteries identified in Plaintiff’s Complaint were, in fact, LG brand 18650 lithium ion cells, LGCAI could not have manufactured the battery cells because LGCAI does not have any manufacturing facilities and has never manufactured any products.

13. LGCAI has never distributed, marketed, advertised, or sold any lithium ion battery cells for use by individual consumers as standalone, removable, replaceable batteries in the State of Missouri, or anywhere.

14. LGCAI has never distributed, marketed, advertised, or sold any lithium ion battery cells directly to consumers for use as standalone, removable, replaceable batteries in the State of Missouri, or anywhere.

15. LGCAI has never distributed, marketed, advertised, or sold any lithium ion battery cells to any individual or entity for re-sale to consumers as standalone, removable, replaceable batteries in the State of Missouri, or anywhere.

16. LGCAI has never engaged, directed, or authorized any individual or entity to distribute, market, advertise, or sell any 18650 lithium ion battery cells to individual consumers for use as standalone, removable, replaceable batteries for any purpose.

17. LGCAI has never distributed, marketed, advertised, or sold any lithium ion battery cells to any distributor, wholesaler, retailer, or any other individual or entity known to LGCAI to be engaged in the business of selling 18650 lithium ion cells directly to consumers for use as standalone, removable, replaceable batteries.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 30th day of August 2021.



HyunSoo Kim